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**UNITED STATES DISTRICT COURT****DISTRICT OF NEVADA**

12 HEATHER RINGO, an individual,

CASE NO: 2:24-cv-00013-JAD-EJY

13 Plaintiffs,  
 14 vs.

15 GARRISON PROPERTY AND CASUALTY  
 16 INSURANCE COMPANY, a foreign  
 corporation, AUTO INJURY SOLUTIONS,  
 INC., a foreign corporation; DOES 1 through  
 17 10; XYZ CORPORATIONS 11 through 20;  
 and ABC LIMITED LIABILITY  
 COMPANIES 21 through 30, inclusive,

18 Defendants.

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY DEADLINES****(FOURTH REQUEST)**

21 Plaintiff, HEATHER RINGO (“Plaintiff”) and Defendant GARRISON PROPERTY  
 22 AND CASUALTY INSURANCE COMPANY (“Garrison” or “Defendant” and together with  
 23 Plaintiff collectively referred to as the “Parties”), by and through their respective undersigned  
 24 counsel, hereby stipulate and agree to extend the discovery deadline by sixty (60) days. This is  
 25 the fourth stipulation to extend discovery deadlines.

**A. DISCOVERY THAT HAS BEEN COMPLETED****Plaintiff**

27 1. Plaintiff made initial disclosures on February 5, 2024.

- 1       2. Plaintiff made her first supplemental disclosures on April 2, 2024.  
2       3. Plaintiff made her second supplemental disclosures on June 14, 2024.  
3       4. Plaintiff made her third supplemental disclosures on July 19, 2024.  
4       5. Plaintiff made her fourth supplemental disclosures on August 23, 2024.  
5       6. Plaintiff sent Defendant requests for production and interrogatories, and  
6           Defendant responded to that discovery.  
7       7. Plaintiff took the depositions of Mara Kilpatrick and Stephanie Zander.

8           **Defendant**

- 9       1. Defendant made initial disclosures on February 5, 2024.  
10      2. Defendant made its first supplemental disclosures on May 23, 2024.  
11      3. Defendant made its second supplemental disclosures on July 1, 2024.  
12      4. Defendant made its third supplemental disclosures on August 6, 2024.  
13      5. Defendant made its fourth supplemental disclosures on October 1, 2024.  
14      6. Defendant made its fifth supplemental disclosures on October 4, 2024.  
15      7. Defendant subpoenaed approximately 20 Plaintiff's medical providers  
16           pharmacies.  
17      8. Defendant sent Plaintiff requests for admission, interrogatories and requests for  
18           production, and Plaintiff responded to that discovery.  
19      9. Defendant made its sixth supplemental disclosure on January 17, 2025.  
20      10. Defendant served amended responses to Plaintiff's interrogatories on January 29,  
21           2025.  
22      11. Defendant scheduled and conducted an Independent Medical Examination of  
23           Plaintiff;

24           **B. DISCOVERY REMAINING**

- 25      1. Plaintiff's supplemental FRCP disclosures;  
26      2. Defendant's supplemental FRCP disclosures;  
27      3. Initial and supplemental expert disclosures;  
28      4. Deposition of Plaintiff;

- 1           5. Deposition of Defendant;  
 2           6. Depositions of the parties' lay witnesses;  
 3           7. Depositions of the parties' expert witnesses; and  
 4           8. Any other potential depositions or written discovery which may become  
 5           necessary as discovery continues.

6 **C. REASONS REMAINING DISCOVERY CANNOT BE COMPLETED WITHIN  
 7 THE TIME SET BY PRIOR DISCOVERY PLAN**

8           The parties have engaged in discovery in this case. Plaintiff has deposed Defendant's  
 9 claims adjusters. Plaintiff has completed her Independent medical examination. Plaintiff's  
 10 deposition is currently scheduled for April 4, 2025. Both parties have served written discovery.  
 11 The parties have discussed settlement, and Defendant has represented it would need to Plaintiff  
 12 to complete an IME before a mediation would be fruitful.

13           The parties request an extension to allow their respective experts to have time to review  
 14 Plaintiff's deposition transcript and the report created for Plaintiff's Independent Medical  
 15 Examination. Good cause exists for this extension because they are working cooperatively in  
 16 discovery, are working towards a mediation, and wish to avoid unnecessary motion practice.

17           No party will be prejudiced by the extension, and the requested extension is made in good  
 18 faith and not for purposes of delay. Based on the foregoing, the parties respectfully request that  
 19 the Court grant their joint request to extend the deadline in accordance with the requested  
 20 amended discovery deadlines.

21 **D. PROPOSED SCHEDULE FOR COMPLETING REMAING DISCOVERY**

| Event                      | Current Deadline (ECF No. 37) | Proposed Deadline |
|----------------------------|-------------------------------|-------------------|
| Initial Expert Disclosure  | 04/04/25                      | 06/04/25          |
| Rebuttal Expert Disclosure | 05/02/25                      | 07/02/25          |
| Close of Discovery         | 06/06/25                      | 08/06/25          |
| Dispositive Motion         | 07/07/25                      | 09/08/25          |

28           ///

1       **E. CURRENT TRIAL DATE**

2           A trial date has not been set.

3           This request is made in good faith and not for the purpose of delay.

4           DATED this 26<sup>th</sup> day of March 2025.

DATED this 26<sup>th</sup> day of March 2025.

5           **CHRISTIAN MORRIS TRIAL ATTORNEYS**

SPENCER FANE, LLP

6           */s/ Sarah DiSalvo*

*/s/ Mary Bacon*

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14           **ORDER**

15           IT IS SO ORDERED.

16  
17             
18           U.S. MAGISTRATE JUDGE

19           Date: March 26, 2025